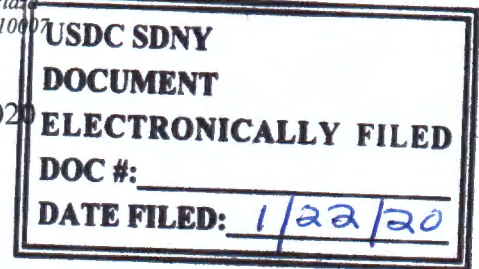


United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Place
New York, New York 10007

January 13, 2020



By ECF

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Almanzar*, 19 Cr. 919 (KMW)

MEMO ENDORSED

Dear Judge Wood:

The Government writes respectfully to request that the Court enter the attached proposed protective order, to which all parties have consented. See Exhibit A. Pursuant to Federal Rule of Criminal Procedure 16, “[a]t any time the court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief.” Fed. R. Crim. P. 16(d). The Government submits that good cause justifies the issuance of this protective order given the nature of information to be disclosed to defense counsel, which includes tax information.

Additionally, the parties request a brief adjournment of the status conference currently scheduled for Wednesday, January 15, 2020, at 3:00 PM. This is the first request for an adjournment, and the additional time will permit the Court to consider the proposed protective order, the Government to produce certain limited discovery to defense counsel pursuant to that order, and the defendant to review such discovery in advance of a change of plea proceeding. If convenient for the Court, both parties are available on February 6, 2020, and February 10, 2020.

The Government has conferred with defense counsel, who consents to the proposed adjournment and to the exclusion of time under the Speedy Trial Act until the next conference.

*The conference is adjourned
to February 13, 2020,
at 2:00 p.m.*

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney
Southern District of New York

By: /s/
Jarrod L. Schaeffer
Assistant United States Attorney
Tel.: (212) 637-2270

cc: James Roth, Esq. (via ECF)

SO ORDERED: N.Y., N.J. 1/14/20

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.